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UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

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In re:

Chapter 11

960 FRANKLIN OWNER LLC,

Case No.: 22-42760 (JMM)

Debtor.

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APPLICATION FOR FINAL DECREE

**TO THE HONORABLE JIL MAZER-MARINO,
UNITED STATES BANKRUPTCY JUDGE:**

The Application by **960 Franklin LLC and Darryl Hagler**, (“Hagler Parties”) by their attorneys, Leech Tishman Robinson Brog, PLLC and **960 Franklin Owner LLC**, the debtor and debtor in possession (“Debtor”), by its attorneys, Backenroth Frankel & Krinsky LLP (collectively the Hagler Parties and Debtor shall be the “Plan Proponents”), respectfully represent:

1. On November 2, 2022, the Debtor filed a Petition for Reorganization under Chapter 11 of the Bankruptcy Code (“Code”), with the Clerk of the United States Bankruptcy Court for the Eastern District of New York (“Court”).

2. On May 19, 2023, the Plan Proponents’ Second Amended Joint Plan of Reorganization (“Plan”) was confirmed by order of this Court.

3. The Plan Proponents have made Plan payments to all classes of creditors in accordance with the Plan and subsequent orders of this Court. Thus, the Plan has been substantially consummated as provided in §1101(2) of the Code

4. The case is ready to be closed.

5. Under Bankruptcy Rule 3022, a party in interest may move for the entry of a Final Decree closing the case and under Local Bankruptcy Rule 3022 a plan proponent shall file, on notice to the United States trustee, an application and a proposed order for a final decree pursuant to Bankruptcy Rule 3022.

6. Upon information, knowledge, and belief, the Plan has been fully implemented and administered in accordance with the terms of the Plan, §350(a) of the Code and Bankruptcy Rule 2015(a).

7. The Office of the United States has been served with a copy of this application and the Final Decree.

8. A proposed form of Final Decree is annexed hereto.

WHEREFORE, the Debtor respectfully requests the issuance by this Court of a Final Decree pursuant to Bankruptcy Rule 3022 closing the Debtor's Chapter 11 Case, and for such other and further relief as the Court may deem just and proper.

Dated: New York, New York
July 10, 2023

**LEECH TISHMAN
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By: /s/ Fred B. Ringel
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